

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

<b>IN RE CAUSTIC SODA ANTITRUST LITIGATION</b>	<b>Lead Case No.: 1:19-cv-00385- EAW- MJR</b>
<b>THIS DOCUMENT RELATES TO:  ALL DIRECT PURCHASER ACTIONS</b>	

**DIRECT PURCHASER PLAINTIFFS' NOTICE OF MOTION  
FOR PRELIMINARY APPROVAL OF SETTLEMENT  
WITH DEFENDANT WESTLAKE CORPORATION**

PLEASE TAKE NOTICE that upon the Declaration of Solomon B. Cera, dated November 1, 2023, together with its supporting exhibits, including the Settlement Agreement between Direct Purchaser Plaintiffs and Westlake Corporation (f/k/a Westlake Chemical Corporation) and the Memorandum of Law in Support of Direct Purchaser Plaintiffs' Motion for Preliminary Approval of Settlement with Defendant Westlake Corporation dated November 1, 2023, Direct Purchaser Plaintiffs ("Plaintiffs") will move this Court on a date and time to be set by the Court, before the Honorable Elizabeth A. Wolford, Chief Judge of the United States District Court for the Western District of New York, at the Kenneth B. Keating Federal Building, 100 State Street, Rochester, NY 14614, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, to enter an order:

- (1) Preliminarily approving the settlement agreement ("Settlement") between Plaintiffs and Defendant Westlake Corporation;

- (2) Certifying a Settlement Class for purposes of settlement only, pursuant to Federal Rule of Civil Procedure 23(e), and authorizing the named plaintiffs to represent the Settlement Class as Settlement Class Representatives;
- (3) Appointing Cera LLP and Kaplan Fox & Kilsheimer LLP to serve as Settlement Class Counsel;
- (4) Approving the proposed notices of Settlement and the notice plan;
- (5) Approving Kurtzman Carson Consultants LLC (“KCC”) as claims administrator, and Huntington National Bank as escrow agent;
- (6) Entering a schedule for final approval of the Settlement, including a schedule for anyone to exclude itself from the Settlement Class, for any objections to the Settlement, to the request for attorneys’ fees or for reimbursement of expenses, or to the *pro rata* plan of allocation, and for a final hearing on the fairness of the Settlement at a time convenient for the Court, following notice to the Settlement Class; and
- (7) Granting such other and further relief as may be appropriate.

Dated: November 1, 2023

Respectfully submitted,

By: /s/ Marco Cercone  
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*Interim Liaison Class Counsel*

By: /s/ Solomon B. Cera

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By: /s/ Robert N. Kaplan

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